



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

JAN - 7 2011

Lieutenant Colonel Troy Fontenot
U.S. Army Installation Management Command
11711 North IH 35 Suite 110
San Antonio, TX 78233-5491

RE: Early Transfer of the Louisiana Army Ammunition Plant, Doyline, Louisiana
Environmental Baseline Survey

Dear Lieutenant Colonel Fontenot:

In 2004, the United States Department of the Army (Army) agreed to transfer the Louisiana Army Ammunition Plant (LAAAP) near Doyline, Louisiana, to the State of Louisiana Military Department. The LAAAP is a military installation comprising approximately 14,949 acres of land and is listed on the National Priorities List. The property has undergone partial cleanup under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) (42 U.S.C. § 9601 - 9675). The United States Environmental Protection Agency (EPA) and the Army have executed and continue to implement a Federal Facilities Agreement (FFA) for the CERCLA response.

The Army proposed that the transfer be undertaken pursuant to § 120(h)(3)(C) of CERCLA, which allows the Federal Government to transfer real property before all environmental remediation is complete provided certain conditions are met. For property that is listed on the National Priorities List, the EPA Administrator, with the concurrence of the Governor of the State, may defer the requirement of CERCLA § 120(h)(3)(a)(ii)(I), which mandates that a Federal agency give a transferee a deed covenant that all remedial action has been completed on the property, thereby allowing such early transfers to occur.

On December 7, 2004, the EPA Region 6 authorized the deferral of the covenant required by CERCLA § 120(h)(3)(a)(ii)(I) with several findings. Among other things, the EPA Region 6 expected that the Department of Army would follow and implement appropriate Department of Defense guidance concerning the preparation and completion of an Environmental Baseline Survey. In addition, the Army's Environment, Safety, and Occupational Health, and Housing and Installations Departments committed to enforce property management restrictions to ensure protection of human health and the environment; to conduct the response actions necessary at the Site per the FFA and response action schedule approved by EPA; to take necessary actions to secure funding for response actions needed at the Site due to Army activity; and to take necessary

LAAAP EBS Approval

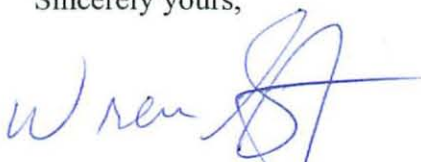
response actions where any potential or actual unacceptable exposure to hazardous substances or constituents are identified in the EBS.

The EPA Region 6 acknowledges receipt of the Environmental Condition of Property Report, Former Louisiana Army Ammunition Plant, Doyline, Louisiana, November 4, 2010. This submittal satisfies the expectation that an Environmental Baseline Survey would be prepared and completed as stipulated in the EPA Region 6 transfer approval dated December 7, 2004.

The EPA Region 6 anticipates that the Department of Army will take necessary response actions where any potential or actual unacceptable exposure to hazardous substances or constituents are identified in the Environmental Condition of Property Report, Former Louisiana Army Ammunition Plant, Doyline, Louisiana, November 4, 2010. If a dispute arises concerning hazardous substances or constituents on the site and it is unclear from the Environmental Condition of Property Report, Former Louisiana Army Ammunition Plant, Doyline, Louisiana, November 4, 2010, as to whether the hazardous substances or constituents were released by the Army prior to December 7, 2004, the EPA Region 6 will expect the Army to address the hazardous substances or constituents in question. While this letter acknowledges completion of the early transfer Environmental Baseline Survey process, it does not purport to modify the Department of Army's Site remediation responsibilities under the January 1989 FFA.

If you have any questions, please contact Michael A. Hebert of my staff at 214-665-8315 or George Malone, EPA attorney at 214-665-8030.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "W. Coleman", with a large, stylized flourish at the end.

for Samuel Coleman, P.E.
Director
Superfund Division

cc: Jeffrey Parham (LDEQ)
Craig Johnson (URS)